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ORTHO

Chevron Chemical Company

Barbara Cook
HWM - Chevron Chemical
Ft. Madison
jm

September 2, 1983

Mr. P. Culver
Air and Waste Management Division
EPA Region VII
324 East Eleventh Street
Kansas City, Missouri 64101

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DEPARTMENT OF
WATER, LAND AND
WATER POLLUTION CONTROL

Attn: Ms. Jo Ann Heiman

Dear Mr. Culver:

This letter is confirmation of the telephone conversation with Mr. John Maier of our staff on September 2, 1983, regarding the potential renovation of asbestos containing insulation on various process equipment and related piping in our ammonia plant. The plant is being reactivated for start-up following a 16 month shutdown. It is anticipated that an unknown quantity of asbestos containing insulation will require replacement.

The following is submitted in accordance with 40 CFR 61.22 (d)(2) regarding prior notification of renovation.

- (i) Name of owner: Chevron Chemical Company
- (ii) Address: Post Office Box 282
Fort Madison, Iowa 52627
- (iii) Description of equipment being renovated including age and approximate amount of friable asbestos materials present.
 - 1. The specific equipment and/or piping and the amount of material involved is not known at this time. The amount of renovation will depend on the degree of repairs required upon commissioning the various pieces of process equipment and lines. It is anticipated the quantity may exceed the 260 feet of pipe as specified in paragraph (d) of subsection 61.22.
 - 2. The equipment, piping and corresponding insulation was installed in 1961.
- (iv) Location of facility:
Ammonia plant at Chevron Chemical's fertilizer manufacturing facilities located on Ortho Road. Fort Madison, Iowa.



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(v) Scheduled starting and completion dates:

The asbestos containing insulation renovation will start on September 15, 1983, and is scheduled for completion on December 15, 1983.

(vi) Nature of planned renovation:

The deteriorated asbestos containing insulation will be replaced with a calcium silicate block insulation with an outer aluminum metal armour.

(vii) Procedures to be employed to meet the requirements of this paragraph and paragraph (j) of this section.

The removal of the asbestos containing insulation will be conducted in accordance with OSHA and Iowa OSHA regulations and in accordance with (i)(A), (i)(B) and (i)(C) of paragraph (j). The insulation will be adequately wetted prior to removal. The asbestos containing waste material is to be sealed in six mil. plastic bags while wet.

(viii) The name and location of the waste disposal site:

Disposal is to be in the Lee County Sanitary Landfill, Denmark Road, Fort Madison, Iowa, in accordance with Iowa Department of Water, Air and Waste Management Authorization No. 560705178304.

(ix) Not applicable.

If you have any questions, please contact Mr. John Maier or Mrs. Helen Ordway at 319-372-6012.

Very truly yours,

A. A. Fitzsimmons
Plant Manager

JLM:cm

cc: Mrs. Barbara Cook, IDWAWM